

EXHIBIT 3

Swanson, David

From: Joyce Lindauer <joyce@joycelindauer.com>
Sent: Wednesday, March 24, 2021 1:20 PM
To: Swanson, David
Subject: RE: Harrison/A-Z--Meet-and-Confer

**** External email ****

I hate to put this off but I really need Guy available as he has so much more knowledge on these matters than I do
I know the funeral is today
So let me see what is availability is for a call

From: Swanson, David <dswanson@lockelord.com>
Sent: Wednesday, March 24, 2021 12:56 PM
To: Joyce Lindauer <joyce@joycelindauer.com>; Unis, Joseph <JUnis@lockelord.com>; Guy Holman <guy@joycelindauer.com>
Subject: RE: Harrison/A-Z--Meet-and-Confer

Joyce,

I am available all afternoon. You can reach me at 214.740.8967, on my cell at 214.695.7389, by text, or at this email address. I can provide a zoom meeting or a dial-in. If you want to meet in person at our offices, I have a conference room reserved.

Look forward to hearing from you again soon.

David

David L. Swanson
Locke Lord LLP
214.740.8514 (office)
214.695.7389 (mobile)

From: Joyce Lindauer <joyce@joycelindauer.com>
Sent: Wednesday, March 24, 2021 12:48 PM
To: Unis, Joseph <JUnis@lockelord.com>; Guy Holman <guy@joycelindauer.com>
Cc: Swanson, David <dswanson@lockelord.com>
Subject: RE: Harrison/A-Z--Meet-and-Confer

**** External email ****

I will look at it this afternoon

From: Unis, Joseph <JUnis@lockelord.com>
Sent: Tuesday, March 23, 2021 6:37 PM
To: Joyce Lindauer <joyce@joycelindauer.com>; Guy Holman <guy@joycelindauer.com>
Cc: Swanson, David <dswanson@lockelord.com>
Subject: RE: Harrison/A-Z--Meet-and-Confer

Joyce and Guy,

Please see my email, below. The attachment were apparently too big for your server, so it bounced back.

I've uploaded the attachment to the following Box link: <https://app.box.com/s/rhwww9gvr87ycwmr9kqh9963ls5hvhwy>

Let us know if you have any issue accessing.

Thanks,

Joe Unis

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From: Unis, Joseph

Sent: Tuesday, March 23, 2021 6:27 PM

To: 'Joyce Lindauer' <joyce@joycelindauer.com>; Guy Holman <guy@joycelindauer.com>

Cc: Swanson, David <dswanson@lockelord.com>

Subject: Harrison/A-Z--Meet-and-Confer

Joyce,

I received Guy's voicemail, and as he requested, I am following up with an email. I understand that Guy is on the road, and will be unavailable to participate in a meet and confer tomorrow, so you will be handling. However, we still do not know what time(s) you are available tomorrow—when can we call you? I am assuming you want to confer telephonically, but let us know if you prefer Zoom. Also, if we need to push to Thursday morning to accommodate your schedule, we can do so (but we should file something with the Court tomorrow).

Based on Guy's email, it sounds like Defendants will be amending their exhibit list. It will be difficult to meaningfully confer and stipulate without a final (or near final exhibit list). Based on the list you served last week, we have prepared the attached chart of objections (for discussion purposes). It will certainly be easier to talk through these live, but in short, we are willing to stipulate to certain documents, where no objection is charted (but not to Defendants' characterization or "general description" of those documents).

We may also be able to eliminate some exhibits via stipulation; for others we will need to talk through our objections and Defendants' responses to same. Specifically:

- If we have D-1, 2, 40, and 41 in the record, can we stipulate to the range, eliminating the need for D-3 through D-39 (which are cumulative)?
- Also, we don't understand why D-33 is necessary (as D-36 shows a corresponding credit).
- Text message were sent in an effort to collect the debt; they are irrelevant, or should be protected as settlement communications. But if they are going to be offered, they should be offered as complete sets (to avoid optional completeness). Accordingly, I am attaching the complete communications from Harrison's production.
- The state court lawsuit was nonsuited, and the Court struck Defendants' estoppel defense; accordingly D-43, 44, 45, and 46 are not relevant, and confusing.
- We don't understand why you need D-50? How is it relevant?
- D-51 – although we do not think it is relevant, if we are going to include it, we should include the corresponding statement for the Waco location, too.
- We don't understand why you need Plaintiff's original complaint (D-52) – how is it relevant for trial?

The other objections in our chart should be self-explanatory. Of course, if you disagree with anything above, please explain, so we can discuss during our meet and confer.

Finally, I am also attaching a list of proposed stipulations. None of these fact should be in dispute. Our intent is to help to streamline things for Friday (and for trial), to save the Court, the parties, and the jury time. To that end, if there are other stipulations that Defendants want to propose, please let us know, and we can discuss during our meet-and-confer.

We look forward to hearing from you.

Thanks,

Joe

Joe Unis

Locke Lord LLP

2200 Ross Avenue, Suite 2800

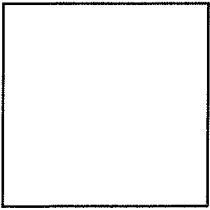
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